

UNITED STATES OF AMERICA,  
Plaintiff,  
v.  
RYAN CHAMBERLAIN,  
Defendant.

STIPULATION AND ~~[PROPOSED]~~  
ORDER TO CONTINUE

At the last appearance before this Court on September 29, 2014, the parties informed the Court that the government had given the defense a voluminous amount of discovery on the day of that hearing. In fact, the volume of discovery was much larger than stated to the Court, and the defense is still awaiting additional discovery from the government. Additionally, the parties are in the process of meeting and conferring to try to resolve outstanding discovery disputes. Accordingly, the parties are jointly requesting an additional week time to address these issues and request a continuance of this matter to October 20, 2014 at 2:00 p.m.

For the above reasons, the parties stipulate there is good cause – taking into account the public interest in the prompt disposition of this case – to exclude the time from October 14, 2014 to October 20, 2014 from computation under the Speedy Trial Act, and that failing to exclude that time would unreasonably deny the defendant and his counsel the reasonable time necessary for effective preparation of counsel taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(A) and (B)(iv). The parties further agree that the ends of justice would be served by excluding the time from October 14, 2014 to October 20, 2014 from computation under the Speedy Trial Act and that the need for the exclusion outweighs the best interests of the public and the defendant in a speedy trial.

IT IS SO STIPULATED.

10/8/14  
DATED

/s/  
PHILIP KEARNEY  
Assistant United States Attorney

10/8/14  
DATED

/s/  
JODI LINKER  
Assistant Federal Public Defender

IT IS SO ORDERED.

October 10, 2014  
DATED

  
VINCE CHHABRIA  
United States District Judge